

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GENOA COLOR TECHNOLOGIES, LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 07-CIV-6233 (PKC)
MITSUBISHI ELECTRIC CORP.; MITSUBISHI	)	
ELECTRIC US HOLDINGS, INC.; MITSUBISHI	)	
ELECTRIC AND ELECTRONICS USA, INC.;	)	
MITSUBISHI DIGITAL ELECTRONICS	)	
AMERICA, INC.; SAMSUNG ELECTRONICS CO.,	)	
LTD.; SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	
-----	X	

**SUPPLEMENTAL DECLARATION OF BRIAN G. BIELUCH IN SUPPORT OF  
THE SAMSUNG DEFENDANTS' CLAIM CONSTRUCTION SUR-REPLY BRIEF**

I, Brian G. Bieluch, declare as follows:

1. I am an associate in the law firm of Covington & Burling LLP. The following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to them. I submit this declaration in support of the Samsung Defendants' Claim Construction Sur-Reply Brief.

2. Attached hereto as Exhibit I is a true and correct copy of an excerpt from Patent Application No. 09/710,895, the parent application of U.S. Patent No. 7,113,152.

3. Attached hereto as Exhibit J is a true and correct copy of an Office Action of the U.S. Patent and Trademark Office dated April 24, 2002.

4. Attached hereto as Exhibit K is a true and correct copy of an Applicants' Amendment dated October 23, 2002.

5. Attached hereto as Exhibit L is a true and correct copy of an Applicants' Amendment dated August 11, 2005.

6. Attached hereto as Exhibit M is a true and correct copy of an Applicants' Amendment dated December 20, 2005.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 4, 2008, at Washington, DC.

By: Brian G. Bieluch

Brian G. Bieluch